

Yale University

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Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

January 7, 2015

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel, Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of Yale School of Drama and Yale Repertory Theater, located in New Haven, CT, which provides more than 300 performances to approximately 65,000 audience members per year and graduate education programs to 200 students, I write with concern about protection for our wireless microphones and backstage communications devices. We train and advance leaders to raise the standards of global professional practice in every theatrical discipline, creating bold art that astonishes the mind, challenges the heart, and delights the senses, and wireless technology plays an integral role in serving that mission.

We understand the Commission has ruled that performing arts entities which regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. We've also learned that the FCC is seeking comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave our organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if we don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and also mitigates significant public safety concerns. Professional wireless capability, with successful interference protection, is absolutely essential to our sector.

Virtually every production we undertake uses some form of wireless technology. We routinely utilize wireless microphones, wireless in-ear monitors, wireless headsets for backstage communication, as well as wireless lighting dimmers and other wireless effects. Some performances use as few as one or

two wireless devices, while others use as many as 40. Regardless of the quantity, it is imperative to the success of our shows that these devices be free from interference in the wireless spectrum.

All of our wireless microphones and in-ear monitors are analog, operate in the 500MHz and 600MHz spectrum, and are adjustable to a variety of frequencies within those bandwidths. Our wireless headsets for backstage communications are digital, and operate at 2.4GHz, with no ability to alter the frequencies.

We own the majority of wireless devices used in our productions, but occasionally rent additional outside equipment for particularly demanding shows. We expect that these devices have a lifespan of approximately 10 to 15 years. Thankfully, none of our equipment operates in the 700MHz band, so we have not yet had to replace our equipment.

We appreciate that the Commission has sought public comment on these critical issues. Professional performing arts organizations should all have full interference protection. While some entities will be protected by access to the geo-location database, many professional performing arts organizations will be left unprotected under this plan.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, and entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Backhaus", with a long horizontal flourish extending to the right.

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